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**MEMO ENDORSED**

January 25, 2013

VIA E-MAIL

Hon. Paul A. Engelmayer  
United States District Judge  
United States District Court  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: Kreisler v. Abid, et al.  
Case No. 12 Civ. 4052 (PAE)

Dear Judge Engelmayer:

I represent the Plaintiff, Todd Kreisler, in the above referenced matter. Defendant Abid filed an Omnibus Motion [Dkt. 54] on January 24, 2013. Plaintiff's Opposition Motion is currently due on or before February 7, 2013. The undersigned will be out of state, on vacation, from January 28, 2013 to February 1, 2013, and therefore respectfully respects an extension of time, until February 15, 2013 to respond to the Plaintiff's Motion. There have been no previous requests for an adjournment to respond to the Motion. Counsel for defendant 305 East 24<sup>th</sup> Owners has consented. Counsel for defendant Abid has not consented, indicating the Court will be scheduling a hearing date.

Plaintiff's counsel also respectfully requests an additional thirty (30) days to file a Second Motion to Amend the Complaint, for the purpose of, *inter alia*, adding an additional defendant, Kam Four, Inc. Attached hereto is an amended civil case management plan.

Thank you.

Respectfully submitted,

/s/Adam Shore

Adam T. Shore, Esq.

Enc.

cc: VIA E-MAIL

Gary S. Ehrlich, Esq.

Cantor, Epstein & Mazzola, LLP  
w/enc.

*An extension of time to respond to defendant Abid's motion is granted to February 15, 2013. Defendants are directed to respond to plaintiff's request to amend his complaint.*

1/30/13

**SO ORDERED:**

*Paul A. Engelmayer*

HON. PAUL A. ENGELMAYER  
UNITED STATES DISTRICT JUDGE

VIA E-MAIL

Barry N. Frank, Esq.  
w/enc.